

BLANCHARD, WALKER, O'QUIN & ROBERTS

(A PROFESSIONAL LAW CORPORATION)

1400 BANK ONE TOWER, 400 TEXAS STREET
SHREVEPORT, LOUISIANA 71101
TELEPHONE (318) 221-6858 TELECOPIER (318) 227-2967
bwor@bwor.com

MAILING ADDRESS:
POST OFFICE DRAWER 1126
SHREVEPORT, LOUISIANA 71163-1126

JOHN T. COX, JR.
W. MICHAEL ADAMS
WM. TIMOTHY ALLEN III
REGINALD E. CASSIBRY, P.C.
J. DAVID GARRETT
CECIL W. TALLEY
M. THOMAS ARCENEUX
ROBERT W. JOHNSON
PAUL M. ADRINS
LESLIE IDOM KALMBACH
GARY H. LOVE
F. MICHAEL CARMODY
KIMBERLY D. BELANGER
CLINTON S. SIMON

NEWTON C. BLANCHARD (1922)
ELIAS GOLDSTEIN (1962)
HENRY C. WALKER (1963)
ARTHUR O'QUIN (1972)
WILTON H. WILLIAMS, JR. (1975)
LEON O'QUIN (1979)
JOSEPH W. MILNER (1989)
ROBERT ROBERTS, JR. (1991)
CLYDE W. THURMON (1992)
PIKE HALL, JR. (1999)
MARLIN RISINGER, JR. (2002)

February 4, 2004

OF COUNSEL
GILBERT L. HETHERWICK
ROBERT ROBERTS III
NEILSON S. JACOBS

Honorable James H. Welsh
Commissioner of Conservation
State of Louisiana
Post Office Box 94275
Baton Rouge, Louisiana 70804-9275

RE: HEARING APPLICATION
Vaughn Sand
Lisbon Field
Claiborne Parish, Louisiana
Our File No. 230593.0046

Dear Sir:

In accordance with the Rules of Procedure of the Commissioner of Conservation, notice is hereby given that COMSTOCK OIL & GAS - LOUISIANA, INC. intends to make application to the Commissioner of Conservation of the State of Louisiana for a public hearing to receive evidence concerning the following matters relating to the Vaughn Sand, in the Lisbon Field, Claiborne Parish, Louisiana:

1. To create one (1) additional drilling and production unit (to be designated as VGN SUH) for the exploration for and production of gas and condensate from the Vaughn Sand, in the Lisbon Field, Claiborne Parish, Louisiana, as shown on the plat attached hereto.
2. To force pool and integrate all separately owned tracts, mineral leases, and other property interests within the proposed unit, with each tract sharing in unit production on a surface acreage basis of participation.
3. To designate Comstock Oil & Gas - Louisiana, Inc. as unit operator and the Comstock Oil & Gas - Louisiana, Inc. - King No. 1 Well as the unit well for the proposed VGN SUH, in exception to the well spacing provisions of Order No. 9 - C, effective November 10, 1945.

4. To consider such other matters as may be appropriate and justified by the evidence presented at the hearing.

The Vaughn Sand, in the Lisbon Field, Claiborne Parish, Louisiana, is fully defined in Order No. 9-C, effective November 10, 1945.

Pertinent data regarding this application will be made available for inspection at the offices Blanchard, Walker, O'Quin & Roberts, 400 Texas Street, Suite 1400, Shreveport, Louisiana 71101. Any person wishing to inspect such data should call Mr. Wm. Timothy Allen III at (318) 221-6858 during normal business hours or write Mr. Allen at the above address, in order to arrange a date and time for such inspection. Copies of such pertinent data can be obtained at the expense of the requesting party.

A list of the names and addresses of all Interested Owners, Represented Parties and Interested Parties (as defined in the Rules of Procedure) is attached and a copy of this application, with the attached plat, is being sent to each of such persons. A reasonable effort has been made to determine that the enclosed list includes all of the persons required by the Rules of Procedure. The Applicant will also arrange for mailing, posting and publication of the legal notice of this hearing in accordance with the Rules of Procedure.

By Pre-Application Notice dated January 20, 2004, applicant advised the Commissioner of Conservation, the District Manager and all Interested Owners, Represented Parties and Interested Parties of applicant's intention to apply for the hearing which is the subject of this application. Applicant received no request for a conference, and accordingly, no conference will be held.

A check in the amount of \$755.00 payable to the Commissioner of Conservation is enclosed herewith as the statutory fee for holding the requested hearing.

This application is being filed in duplicate, and a copy hereof is being sent to Mr. James C. Broussard, Shreveport District Manager of the Office of Conservation and to each Interested Owner, Represented Party and Interested Party whose name is shown on the attached list.

Very truly yours,

BLANCHARD, WALKER, O'QUIN & ROBERTS

By: 

Wm. Timothy Allen III

Attorneys for Pinnacle Operating Company, Inc.

WTAIII:bp
Enclosures

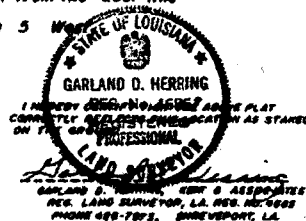
- cc: Mr. James C. Broussard, District Manager
Office of Conservation, Shreveport, La. (w/enclosures)
- cc: Interested Owners, Represented Parties
and Interested Parties (w/copy of plat only)

KING No. 1

Ground Elevation No. 1: 353.4 ft

DATE: Oct. 5, 1994

SCALE: 1" = 1000'



**LISBON FIELD
CLAIBORNE PARISH, LOUISIANA
UNIT PLAT
PROPOSED VGN SU H**